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January 3, 2022

**VIA ECF**

Hon. Sanket J. Bulsara  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

*Re: The Providence Groups, LLC v. Omni Administrators, Inc.  
d/b/a Leading Edge Administrators (1:20-cv-05067 (FB) (SJB))*

Dear Magistrate Bulsara:

We are counsel to The Providence Groups, LLC (“Providence”) in the above-referenced matter. In compliance with Section IV(B) of Your Honor’s Individual Practices, Providence submits this letter in response to Leading Edge Administrators’ (“LEA”) letter motion, filed on December 30, 2021, seeking an Order directing Providence to produce documents in response to LEA’s First and Second Requests for Production of Documents as well as an extension of the discovery deadline. [Doc. No. 40]. As LEA’s letter motion was filed during the holiday weekend (this office was closed for the New Year’s holiday December 30 and 31, 2021), we are just now receiving and reviewing LEA’s motion today. Given more time to respond, we would have preferred to discuss this matter with counsel for LEA, as we intend to reply to any outstanding requests by Friday, January 7, 2022.

As stated in LEA’s letter motion, this case involves Providence’s claims against LEA for failure to process and pay medical claims in accordance with its obligations as the third-party-administrator for Providence’s employee health benefit plan. The relevant time period is December 2017 through August 2019.

In response to the detailed timeline provided by LEA in its motion, Providence would point out the following additional pertinent facts:

- On November 3, 2021, undersigned counsel sent a One Drive link to counsel for LEA providing file folders for three Providence employees, Rachel Kamua, Gretchen Cox and Greg Mitchell.
- Counsel for LEA did not complain of any deficiencies in this production until over three weeks later on November 29, 2021, when he indicated that he was unable to open the

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Outlook file for Rachel Kamua. Counsel never made any mention of not being able to open the Outlook file for Greg Mitchell and LEA's motion is the first time this has been brought to our attention.

- In the meantime, this firm was implementing a new discovery provider platform, and on December 15, 2021, all emails from Rachel Kamua (totaling over 5,000 documents) were provided through this new platform to counsel for LEA.

Again, Providence intends to fully respond to all other requests in the First and Second Document Demands by this Friday, January 7, 2022. Providence is not opposed to extending the discovery deadline in order to accommodate both parties' needs for additional discovery and depositions and would propose that discovery be extended until April 30, 2022.

Thank you in advance for your time and consideration of this response.

Very truly yours,

HOLIFIELD & JANICH, PLLC

A handwritten signature in black ink, appearing to read "Al Holifield". The signature is fluid and cursive, with the first name "Al" being more prominent and stylized than the last name "Holifield".

By: \_\_\_\_\_  
Al Holifield